

DEPARTMENT OF THE ARMY
Corps of Engineers, Missouri River Division
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MRD-R 1110-1-11

CEMRD-ED-TG

Regulation
No. 1110-1-11

1 March 1994

Engineering and Design
TECHNICAL OVERSIGHT DURING PRECONSTRUCTION FIELD ACTIVITIES
ON HAZARDOUS WASTE PROJECTS

1. Purpose. The purpose of this regulation is to require technical oversight of all field investigations and other predesign and design activities at hazardous waste sites. This regulation is not intended to address site visits by design personnel during construction.

2. Applicability. This regulation is applicable to all elements of the Missouri River Division involved in hazardous waste projects.

3. References.

- a. 29 CFR 1910.120, Hazardous Waste Site Operations and Emergency Response.
- b. ER 1110-1-8, Required Visits to Construction Sites by Design Personnel, 23 May 1980.
- c. ER 1110-1-263, Chemical Data Quality Management for Hazardous Waste Remedial Activities, 1 October 1990.
- d. CEEC-EB Memorandum, 17 June 1988, subject: U.S. Army Corps of Engineers, Hazardous and Toxic Waste Management Plan.

4. Background. Quality assurance of field activities requires oversight of the various work elements involved. Detailed work plans are necessary to initiate quality work; but field oversight is required to ensure approved methods and procedures are used to perform the work. Nonrepresentative data, resulting from poor field methods are difficult to detect, expensive and time consuming to confirm. Decisions relating to remedial design, cost, and health and safety are based on these data, making it necessary to ensure their quality is at the minimum acceptable level to support each project's data quality objectives. Oversight by technical personnel will help to ensure:

- a. Samples and field data are gathered according to accepted protocols.
- b. Activities are carried out safely and according to contract requirements and minimum technical standards.

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5. Policy.

a. Critical activities requiring field oversight will include the following: monitoring well installation and development, sampling of all types, sample handling, geophysical surveys, aquifer testing, and pilot testing.

b. Trained, experienced technical personnel will perform technical oversight. These personnel will be knowledgeable in the areas necessary for assessing the quality of the work being performed. This includes having a thorough knowledge of the contract requirements.

c. Personnel making site inspections must comply with the requirements of Occupational Safety and Health Administration (OSHA) standards, specifically 29 CFR 1910.120. In addition, on-site personnel must adhere to the site specific health and safety requirements of the approved Site Safety and Health Plan.

d. The timing and length of site inspections will be determined on a site-specific basis considering the following factors:

(1) Type and complexity of the work being conducted.

(2) Known and/or suspected complexities of the site's character.

(3) Level of confidence in the actual field team members (the performance of different field teams even within the same company may vary dramatically).

(4) The type and severity of sample quality problems as noted by the quality assurance laboratory during project execution.

6. Responsibilities.

a. District oversight personnel will document site activities and note if technically adequate field protocols are used. Problems observed in the field will be identified and reported to the contracting officer (CO) or the contracting officer's representative (COR) for immediate resolution.

b. Oversight personnel will prepare a report upon completion of the Site inspection. The report will be appropriately routed and, at a minimum, will document:

(1) All deficiencies or problems noted during the course of the inspection, and any recommendations to improve the quality of the field work.

(2) Discussions held with the architect engineer (A-E)/contractor and corrective actions taken by the A-E/contractor.

(3) Items requiring follow-up action by the USACE or the A-E contractor.

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(4) Unresolved questions from the A-E/contractor, the user, others contacted and the Corps oversight personnel.

(5) Site features observed which may impact a remedial action design.

(6) Health and safety protocols and levels of protection

(7) General quality of the work observed.

c. District project managers will support this regulation through funding and schedule coordination with the appropriate technical personnel.

d. The CO or COR will forward a list of the deficiencies noted to the A-E/contractor who will be required to document, within a designated time, the corrective actions taken. The A-E/contractor's responses will be evaluated for adequacy and the need for further action will be determined by the CO/COR.

7. Implementation. The requirements of this regulation will be implemented on all hazardous waste projects where contracted field activities are taking place. Site inspections will be coordinated with the appropriate agencies or interested parties. Checklists and/or inspection forms will be developed and training of oversight personnel will be conducted, as necessary, to implement this regulation.

/s/

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